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Via ECFS and Overnight Delivery

February 6, 2012

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

RE: Application of Healinc Telecom, LLC for Recertification as a provider of VRS, and Certification as a Provider of IP Relay, Eligible for Compensation from the Interstate TRS Fund, In the Matter of Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51

Dear Secretary Dortch:

Healinc Telecom, LLC's ("Healinc") December 1, 2011 application for Commission recertification as a provider of video relay service and Internet Protocol relay service eligible for compensation from the Interstate TRS Fund ("Application")<sup>1</sup> contained a Consumer and Government Affairs Bureau ("Bureau")-identified inaccuracy, regarding which the Company hereby seeks to clarify. This clarification is made exclusively for purposes of maintaining an accurate record of its compliance.

According to the *Public Notice* in this matter,<sup>2</sup> Healinc's Application stated that, "that its VRS platform coupled with its Emergency Routing System will be able to access certain information from "the Neustar Registered Location database."<sup>3</sup> The Bureau reminded Healinc that:

<sup>1</sup> Healinc Telecom, LLC, *Internet-Based TRS Certification Application*, CG Docket No. 10-51 (filed Dec. 1, 2011) supplemented on December 28, 2011.

<sup>2</sup> *Notice of Conditional Grant of Application of Healinc Telecom, LLC for Recertification as a Provider of Video Relay Service s for Compensation from the Interstate Telecommunications Relay Services (TRS) Fund*, CG Docket No. 10-51, *Public Notice*, DA 12-5 (Rel. January 4, 2012)

providers do not obtain registered location information from the TRS Numbering Directory, which is maintained by its administrator, Neustar...

and

...because the TRS Numbering Directory does not maintain a list of registered location information for VRS users, Healinc must maintain its own database of such registered location information in order to comply with the numbering requirements.

Healinc readily recognizes its obligation to, and moreover has since implementation of ten-digit number assignment requirements, maintained its own subscriber registered location information ("RLI") database. Healinc's RLI database is populated with subscriber information obtained by Healinc at the time a new subscriber record is created or an existing subscriber record is amended.<sup>4</sup> The RLI database resides on Healinc's servers and is fully integrated with the Company's Automatic Call Distribution Platform and Bandwidth.com Emergency Routing System ("ERS") as will be demonstrated to the Commission during the Commission's on site visit.

Page 23 of Healinc's Application had indeed made reference to the Neustar TRS Numbering Directory. Such reference was intended to explain Healinc's RLI database integration with the Numbering Directory rather to suggest a reliance on the Directory for compliance purposes. Clearly, full responsibility for RLI database development, retention and management lies squarely with Healinc, as will be confirmed by the Commission. Healinc regrets the ambiguity of its statement, and appreciates the Bureau's underscoring of this point.

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<sup>3</sup> *Public Notice* at 3 citing to Healinc Application at 23.

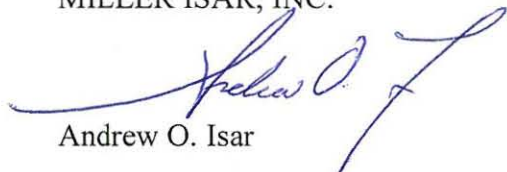
<sup>4</sup> Either created or amended on line at <http://www.lifelinks.net/> or by contacting Healinc's customer service organization.

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Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.

A handwritten signature in blue ink, appearing to read "Andrew O. Isar", with a stylized flourish extending from the end.

Andrew O. Isar

Regulatory Consultants to  
Healinc Telecom, LLC

cc: (via electronic delivery)  
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STATE OF NEW YORK

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) ss.

COUNTY OF BRONX

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**VERIFICATION**

I swear under penalty of perjury that I am Stanley F. Schoenbach, M.D. Chief Executive Officer and Managing Member of Healinc Telecom, LLC, and an officer thereof, and that I have personally examined the foregoing letter clarifying Healinc's compliance with the Commission's Registered Location Identifier database requirements. Further, I swear under penalty of perjury that all statements of fact in this submission are true, accurate, and complete.

Dated this 6<sup>th</sup> day of February, 2012,

Healinc Telecom, LLC

By: \_\_\_\_\_

Stanley F. Schoenbach, M.D.

Chief Executive Officer and Managing Member  
Healinc Telecom, LLC  
3333 Henry Hudson Parkway, Suite 1A,  
Riverdale, NY 10643  
Telephone: 718.543.4100

Subscribed and sworn to before me this 6<sup>th</sup> day of February, 2012

Catalina Morel  
Notary Public

